



## North American Millers' Association

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July 27, 2004

Division of Dockets Management HFA -305  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852  
[Docket No. 1998N-0359]

Dear Sir:

The North American Millers' Association is the trade association representing the wheat, corn, oat and rye milling industry. We work closely with CFSAN and appreciate the effort you make to publish CFSAN's program priorities for each fiscal year. NAMA's 44 member companies operate 166 mills in 38 states and Canada. Their aggregate production of more than 160 million pounds per day is more than 95 percent of the total industry capacity. As the last part of the process before grain is made into consumer products, we have an active interest in biotechnology.

In your FY2003 program priorities, under the category of Food Biotechnology, an "A" priority was given to ***"work with appropriate FDA components and other US government agencies to develop a strategy to ensure that materials derived from non-food use bioengineered plants, such as pharmaceutical or industrial-use crops, do not adulterate the food supply."*** This goal was carried over to FY2004 but is no longer considered an "A" priority. We would like it to remain an "A" priority. NAMA believes the risk of adulteration from genetic material not approved for food and feed entering the food chain is unacceptable and that preventing such adulteration is within the control of the technology developer and the U.S. government. Biotechnology is developing rapidly and it is important for U.S. government policies to keep pace.

We recognize the difficulty in reaching a policy on this matter given the number of government entities involved. Our interest is to make sure that work continues on this very important topic.

Sincerely,

Betsy Faga  
President